

One World Financial Center
27th Floor
New York, NY 10281
(212) 796-6330



1101 17th Street, NW
Suite 1006
Washington, DC 20036
(202) 470-0330

www.morvillolaw.com

WRITER'S CONTACT INFORMATION

AMY WALSH
(212) 796-6347
AWALSH@MORVILLOLAW.COM

September 10, 2014

By ECF

The Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Abraxas J. Discala et al.*, 14 CR 399 (ENV)
Defendant Josephberg's Travel Request

Dear Judge Vitaliano:

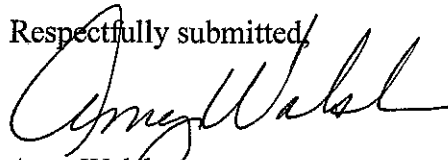
We represent Craig Josephberg in the above-captioned case, and write to request permission for Mr. Josephberg to travel outside the geographic areas set as a condition of his bail. Specifically, Mr. Josephberg would like to travel to Hershey, Pennsylvania with his wife and two children from September 26, 2014 through September 28, 2014. Neither the government (AUSA Shannon Jones) nor Pretrial Services (Officer Ashley Calvi) has any objection to this request.

Currently, Josephberg's conditions of release permit him to travel within New York, New Jersey and Connecticut. Accordingly, we respectfully request the Court to modify Mr. Josephberg's bail conditions so that he may travel on the above-listed dates to Hershey, Pennsylvania. Mr. Josephberg intends to stay at a hotel in Hershey, Pennsylvania, the specifics of which will be provided to Pretrial Services. In addition, Mr. Josephberg will have his cellular telephone with him at all times.

The Honorable Eric N. Vitaliano
September 10, 2014
Page 2 of 2

Thank you for your consideration of this application. I am available at the Court's convenience if Your Honor has any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Amy Walsh", written over the typed name.

Amy Walsh

cc: Assistant U.S. Attorney Shannon Jones (by e-mail)
U.S. Pretrial Services Officer Ashley Calvi (by e-mail)